

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

BRAD AMOS, )  
                  )  
Plaintiff,     )  
                  ) Case No. 3:21-cv-00923  
v.               )  
                  ) Jury Demand  
THE LAMPO GROUP, LLC, et al,     )  
                  )  
Defendants.    )

**JOINT MOTION TO ENTER  
AGREED CONFIDENTIALITY ORDER**

The parties, by and through undersigned counsel and pursuant to Rule 26 of the Federal Rules of Civil Procedure, move the Court to enter the attached Agreed Confidentiality Order. In support of this motion, the parties state as follows:

1. This is a case involving allegations of wrongful termination and misleading or deceptive employment practices.
2. Plaintiff alleges that Defendant Lampo terminated his employment in violation of the Tennessee Public Protection Act and Title VII of the Civil Rights Act of 1964. Plaintiff also alleges that Defendant Lampo and Defendant Ramsey made false and/or misleading statements about the workplace or Plaintiff's employment that induced Plaintiff to accept employment at Defendant Lampo.
3. Defendants contend that Plaintiff was terminated because of his refusal to accept criticism and address his performance issues.
4. This case is likely to involve the discovery of sensitive information such as personnel records of both Plaintiff and other similarly situated employees, including the circumstances surrounding decisions to terminate employment.

5. Plaintiff is also seeking damages related to emotional pain and suffering, professional and personal embarrassment, humiliation, and loss of enjoyment of life, which will require discovery of Plaintiff's personal life, including his protected health information.
6. Defendants' business practices are at issue which may necessitate the discovery of trade secrets.
7. This Confidentiality Order will safeguard this sensitive information, allowing the parties to more efficiently complete discovery and resolve this case.

Respectfully submitted,

/s/Daniel Crowell

Leslie Goff Sanders (TN #18973)  
Daniel Crowell (TN #31485)  
JACKSON LEWIS P.C.  
611 Commerce Street  
Suite 3102  
Nashville, TN 37203  
Telephone: (615) 565-1661  
[leslie.sanders@jacksonlewis.com](mailto:leslie.sanders@jacksonlewis.com)  
[daniel.crowell@jacksonlewis.com](mailto:daniel.crowell@jacksonlewis.com)

*Attorneys for Defendants*

/s/Jonathan A. Street with permission

Jonathan A. Street (TN #21712)  
Brandon Hall (TN #34027)  
Cullen Hamelin (TN #37317)  
Lauren Irwin (TN #38433)  
THE EMPLOYMENT LAW AND CONSUMER LAW GROUP  
1720 West End Avenue  
Suite 402  
Nashville, TN 37203  
[street@eclaw.com](mailto:street@eclaw.com)  
[bhall@eclaw.com](mailto:bhall@eclaw.com)  
[chamelin@eclaw.com](mailto:chamelin@eclaw.com)  
[lauren@eclaw.com](mailto:lauren@eclaw.com)

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I certify that, on July 5, 2022, I caused the foregoing *Joint Motion to Enter Agreed Confidentiality Order* to be filed via the Court's electronic filing system, which will automatically notify and send a copy of the filing to:

Jonathan A. Street  
Brandon Hall  
Cullen Hamelin  
Lauren Irwin  
THE EMPLOYMENT LAW AND CONSUMER LAW GROUP

*Attorneys for Plaintiff*

/s/Daniel Crowell  
Daniel Crowell (TN #31485)  
*Attorney for Defendants*